

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

*IN RE PORK ANTITRUST LITIGATION*

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

JURY TRIAL DEMANDED

ALL ACTIONS BROUGHT BY  
DIRECT ACTION PLAINTIFFS

**AGRI STATS, INC.'S ANSWER AND AFFIRMATIVE DEFENSES TO  
DIRECT ACTION PLAINTIFFS' CONSOLIDATED COMPLAINT**

Defendant Agri Stats, Inc., by its attorneys, Hogan Lovells US LLP, as and for their Answer and Affirmative Defenses to Direct Action Plaintiffs' Consolidated Complaint (the "Complaint"), state as follows:

**ANSWER TO PARAGRAPH 1.** Agri Stats denies the allegations contained in Paragraph 1 of the Complaint.

**ANSWER TO PARAGRAPH 2.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 2 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 2 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 3.** Agri Stats denies the allegations contained in Paragraph 3 of the Complaint.

**ANSWER TO PARAGRAPH 4.** Agri Stats denies the allegations contained in Paragraph 4 of the Complaint.

**ANSWER TO PARAGRAPH 5.** Agri Stats admits that it offers procompetitive benchmarking services to pork processing companies. To the extent any remaining allegations contained in Paragraph 5 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the allegations contained in Paragraph 5 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same..

**ANSWER TO PARAGRAPH 6.** Agri Stats lacks knowledge or information

sufficient to form a belief concerning the truth of the allegations contained in Paragraph 6 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 7.** Agri Stats denies allegations contained in Paragraph 7 of the Complaint.

**ANSWER TO PARAGRAPH 8.** Agri Stats admits that it offered procompetitive benchmarking services to pork processing companies. Agri Stats admits that it receives data from its subscribers regarding their pork business and that it uses that data in the reports it produces. Agri Stats denies that the information in its reports is not the kind of information that would be disclosed in a competitive market. Agri Stats denies the remaining allegations contained in Paragraph 8 of the Complaint.

**ANSWER TO PARAGRAPH 9.** Agri Stats admits that it offered procompetitive benchmarking reports and services to pork processing companies. Agri Stats admits that it received data from its subscribers regarding their pork business and that it uses that data in the reports it produces. Agri Stats denies the remaining allegations contained in Paragraph 9 of the Complaint.

**ANSWER TO PARAGRAPH 10.** Agri Stats admits that it received data from its subscribers regarding their pork business and that it uses that data in the reports it produces. Agri Stats also admits that it is a subscription service. Agri Stats denies the remaining allegations contained in Paragraph 10 of the Complaint.

**ANSWER TO PARAGRAPH 11.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in

Paragraph 11 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 12.** Agri Stats denies the allegations contained in Paragraph 12 of the Complaint.

**ANSWER TO PARAGRAPH 13.** Paragraph 13 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 13 of the Complaint.

**ANSWER TO PARAGRAPH 14.** Agri Stats denies the allegations contained in Paragraph 14 of the Complaint.

**ANSWER TO PARAGRAPH 15.** Agri Stats denies the allegations contained in Paragraph 15 of the Complaint.

**ANSWER TO PARAGRAPH 16.** Paragraph 16 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 16 of the Complaint.

**ANSWER TO PARAGRAPH 17.** Paragraph 17 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 17 of the Complaint.

**ANSWER TO PARAGRAPH 18.** Paragraph 18 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 18 of the

Complaint.

**ANSWER TO PARAGRAPH 19.** Paragraph 19 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 19 of the Complaint.

**ANSWER TO PARAGRAPH 20.** Paragraph 20 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 20 of the Complaint.

**ANSWER TO PARAGRAPH 21.** Paragraph 21 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 21 of the Complaint.

**ANSWER TO PARAGRAPH 22.** Paragraph 22 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 22 of the Complaint.

**ANSWER TO PARAGRAPH 23.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 23 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 24.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in

Paragraph 24 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 25.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 25 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 26.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 26 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 27.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 27 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 28.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 28 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 29.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 29 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 30.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 30 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 31.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 31 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 32.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 32 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 33.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 33 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 34.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 34 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 35.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 35 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 36.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 36 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 37.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 37 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 38.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 38 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 39.** Agri Stats lacks knowledge or information

sufficient to form a belief concerning the truth of the allegations contained in Paragraph 39 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 40.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 40 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 41.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 41 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 42.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 42 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 43.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 43 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 44.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 44 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 45.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 45 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 46.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in

Paragraph 46 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 47.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 47 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 48.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 48 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 49.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 49 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 50.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 50 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 51.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 51 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 52.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 52 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 53.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 53 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 54.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 54 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 55.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 55 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 56.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 56 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 57.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 57 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 58.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 58 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 59.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 59 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 60.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 60 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 61.** Agri Stats lacks knowledge or information

sufficient to form a belief concerning the truth of the allegations contained in Paragraph 61 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 62.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 62 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 63.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 63 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 64.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 64 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 65.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 65 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 66.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 66 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 67.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 67 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 68.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in

Paragraph 68 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 69.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 69 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 70.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 70 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 71.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 71 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 72.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 72 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 73.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 73 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 74.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 74 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 75.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 75 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 76.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 76 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 77.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 77 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 78.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 78 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 79.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 79 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 80.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 80 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 81.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 81 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 82.** Agri Stats admits that it is an Indiana corporation located in Fort Wayne, Indiana. Agri Stats admits that it is a wholly-owned subsidiary of Agri Stats Omega Holding Co. LP, a limited partnership based in Indiana. Agri Stats denies the remaining allegations contained in

Paragraph 82 of the Complaint.

**ANSWER TO PARAGRAPH 83.** Agri Stats denies the allegations contained in Paragraph 83 of the Complaint.

**ANSWER TO PARAGRAPH 84.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 84 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 84 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 85.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 85 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 85 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 86.** Agri Stats denies the allegations contained in Paragraph 86 of the Complaint.

**ANSWER TO PARAGRAPH 87.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 87 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 87 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 88.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 88 of the Complaint. Agri Stats lacks knowledge or

information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 88 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 89.** Agri Stats denies the allegations contained in Paragraph 89 of the Complaint.

**ANSWER TO PARAGRAPH 90.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 90 of the Complaint. To the extent the remaining allegations contained in Paragraph 90 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 90 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 91.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 91 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 91 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 92.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 92 of the Complaint. To the extent the remaining allegations contained in Paragraph 92 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore

denies the same. To the extent the remaining allegations contained in Paragraph 92 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 93.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 93 of the Complaint. To the extent the remaining allegations contained in Paragraph 93 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 93 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 94.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 94 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 94 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 95.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 95 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 95 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 96.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 96 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining

allegations contained in Paragraph 96 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 97.** Agri Stats denies the allegations contained in Paragraph 97 of the Complaint.

**ANSWER TO PARAGRAPH 98.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 98 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 99.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 99 of the Complaint. To the extent the remaining allegations contained in Paragraph 99 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 99 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same

**ANSWER TO PARAGRAPH 100.** Agri Stats denies the existence of a Conspiracy as alleged in Paragraph 100 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 100 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 101.** Agri Stats denies the existence of a Conspiracy as alleged in Paragraph 101 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining

allegations contained in Paragraph 101 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 102.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 102 of the Complaint. To the extent the remaining allegations contained in Paragraph 102 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 102 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 103.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 103 of the Complaint. To the extent the remaining allegations contained in Paragraph 103 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 103 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 104.** Agri Stats denies the existence of a Conspiracy as alleged in Paragraph 104 of the Complaint. To the extent the remaining allegations contained in Paragraph 104 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph

104 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 105.** Paragraph 105 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 105 of the Complaint.

**ANSWER TO PARAGRAPH 106.** Agri Stats denies the allegations contained in Paragraph 106 of the Complaint.

**ANSWER TO PARAGRAPH 107.** To the extent the allegations contained in Paragraph 107 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 108.** Agri Stats denies the allegations contained in Paragraph 108 of the Complaint.

**ANSWER TO PARAGRAPH 109.** To the extent the allegations contained in Paragraph 109 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 110.** To the extent the allegations contained in Paragraph 110 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context.

**ANSWER TO PARAGRAPH 111.** To the extent the allegations contained in Paragraph 111 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 112.** To the extent the allegations contained in Paragraph 112 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 113.** Agri Stats denies the allegations contained in Paragraph 113 of the Complaint.

**ANSWER TO PARAGRAPH 114.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 114 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 114 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 115.** Agri Stats denies the allegations contained in Paragraph 115 of the Complaint.

**ANSWER TO PARAGRAPH 116.** To the extent the allegations contained in Paragraph 116 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 1116 of the Complaint.

**ANSWER TO PARAGRAPH 117.** To the extent the allegations contained in Paragraph 117 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 117 of the Complaint.

**ANSWER TO PARAGRAPH 118.** To the extent the allegations contained in Paragraph 118 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 118 of the Complaint.

**ANSWER TO PARAGRAPH 119.** Agri Stats denies the allegations contained in Paragraph 119 of the Complaint.

**ANSWER TO PARAGRAPH 120.** Agri Stats admits that it offers pro-competitive benchmarking services to pork processor companies. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 120 of the Complaint. To the extent the allegations contained in Paragraph 120 of the Complaint purport to

characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the remaining allegations contained in Paragraph 120 of the Complaint.

**ANSWER TO PARAGRAPH 121.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 121 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 122.** To the extent the allegations contained in Paragraph 122 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the remaining allegations contained in Paragraph 122 of the Complaint.

**ANSWER TO PARAGRAPH 123.** To the extent the allegations contained in Paragraph 123 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the remaining allegations contained in Paragraph 123 of the Complaint.

**ANSWER TO PARAGRAPH 124.** To the extent the allegations contained in Paragraph 124 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 124 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 125.** Agri Stats denies the allegations contained in Paragraph 125 of the Complaint. To the extent the allegations contained in Paragraph 125 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 126.** To the extent the allegations contained in Paragraph 126 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 126 of the Complaint.

**ANSWER TO PARAGRAPH 127.** To the extent the allegations contained in Paragraph 127 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 127 of the Complaint.

**ANSWER TO PARAGRAPH 128.** Agri Stats admits that it offered to meet with its customers. To the extent the allegations contained in Paragraph 128 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 128 of the Complaint.

**ANSWER TO PARAGRAPH 129.** Agri Stats denies the allegations contained in Paragraph 129 of the Complaint.

**ANSWER TO PARAGRAPH 130.** To the extent the allegations contained in Paragraph 130 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the remaining allegations contained in Paragraph 130 of the Complaint.

**ANSWER TO PARAGRAPH 131.** Agri Stats admits that Express Markets is a subsidiary of Agri Stats. Agri Stats admits it added pork to its Express Market analysis in 2015. To the extent the allegations contained in Paragraph 131 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 131 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 132.** To the extent the allegations contained in Paragraph 132 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the remaining allegations contained in Paragraph 132 of the Complaint.

**ANSWER TO PARAGRAPH 133.** Agri Stats denies the allegations contained in Paragraph 133 of the Complaint.

**ANSWER TO PARAGRAPH 134.** Agri Stats denies the allegations contained in Paragraph 134 of the Complaint.

**ANSWER TO PARAGRAPH 135.** Agri Stats admits that it offered procompetitive benchmarking reports and services to pork processing companies. Agri Stats admits that it received data from its subscribers regarding their pork business and that it uses that data in the reports it produces. To the extent the allegations contained in Paragraph 135 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 136.** Agri Stats denies the allegations contained in Paragraph 136 of the Complaint.

**ANSWER TO PARAGRAPH 137.** Agri Stats denies the allegations contained in Paragraph 137 of the Complaint.

**ANSWER TO PARAGRAPH 138.** To the extent the allegations contained in Paragraph 138 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 138 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 138 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 139.** To the extent the allegations contained in Paragraph 139 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 139 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 139 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 140.** To the extent the allegations contained in Paragraph 140 of the Complaint relate to other Defendants and/or third parties to

this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 140 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 140 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 141.** To the extent the allegations contained in Paragraph 141 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 141 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 141 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 142.** To the extent the allegations contained in Paragraph 142 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the

extent the allegations contained in Paragraph 142 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 142 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 143.** To the extent the allegations contained in Paragraph 143 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 143 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 143 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 144.** To the extent the allegations contained in Paragraph 144 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 144 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations

contained in Paragraph 144 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 145.** To the extent the allegations contained in Paragraph 145 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 145 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same. To the extent the allegations contained in Paragraph 145 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 146.** To the extent the allegations contained in Paragraph 146 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 146 of the Complaint.

**ANSWER TO PARAGRAPH 147.** Agri Stats denies the allegations contained in Paragraph 147 of the Complaint. To the extent the allegations contained in

Paragraph 147 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 148.** To the extent the allegations contained in Paragraph 148 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 148 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 148 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 149.** Agri Stats denies the allegations contained in Paragraph 149 of the Complaint.

**ANSWER TO PARAGRAPH 150.** Agri Stats denies the allegations contained in Paragraph 150 of the Complaint.

**ANSWER TO PARAGRAPH 151.** Agri Stats denies the allegations contained in Paragraph 151 of the Complaint.

**ANSWER TO PARAGRAPH 152.** To the extent the allegations contained in Paragraph 152 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 152 of the Complaint.

**ANSWER TO PARAGRAPH 153.** To the extent the allegations contained in Paragraph 153 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 153 of the Complaint.

**ANSWER TO PARAGRAPH 154.** To the extent the allegations contained in Paragraph 154 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 154 of the Complaint.

**ANSWER TO PARAGRAPH 155.** To the extent the allegations contained in Paragraph 155 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 155 of the Complaint.

**ANSWER TO PARAGRAPH 156.** Agri Stats denies the allegations contained in Paragraph 156 of the Complaint.

**ANSWER TO PARAGRAPH 157.** Agri Stats denies the allegations contained in Paragraph 157 of the Complaint.

**ANSWER TO PARAGRAPH 158.** Agri Stats denies the allegations contained in Paragraph 158 of the Complaint.

**ANSWER TO PARAGRAPH 159.** Paragraph 159 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 159 of the Complaint. To the extent the assertions contained in Paragraph 159 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 160.** Paragraph 160 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 160 of the Complaint. To the extent the assertions contained in Paragraph 160 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 161.** Agri Stats denies the allegations contained in Paragraph 161 of the Complaint.

**ANSWER TO PARAGRAPH 162.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 162 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 163.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 163 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 163 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 164.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 164 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 165.** To the extent the allegations contained in Paragraph 165 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 165 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 165 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 166.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 166 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 167.** To the extent the allegations in Paragraph 167 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such documents speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 167 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 168.** To the extent the allegations contained in Paragraph 168 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 168 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 168 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 169.** To the extent the allegations contained in Paragraph 169 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 169 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in

Paragraph 169 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 170.** To the extent the allegations contained in Paragraph 170 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 170 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 170 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 171.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 171 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 172.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 172 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 173.** To the extent the allegations contained in Paragraph 173 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 173 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 174.** To the extent the allegations contained in Paragraph 174 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 174 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 175.** To the extent the allegations contained in Paragraph 175 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 175 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 176.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 176 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 177.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 177 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 178.** To the extent the allegations contained in Paragraph 178 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 178 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 179.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 179 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 179 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 180.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 180 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 181.** To the extent the allegations contained in Paragraph 181 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 181 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 181 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 182.** Agri Stats lacks knowledge or information

sufficient to form a belief concerning the truth of the allegations contained in Paragraph 182 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 183.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 183 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 184.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 184 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 185.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 185 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 186.** To the extent the allegations contained in Paragraph 186 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 186 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 187.** To the extent the allegations contained in Paragraph 187 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. To the extent the allegations contained in Paragraph 187 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 187 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 188.** Agri Stats denies the allegations contained in Paragraph 188 of the Complaint.

**ANSWER TO PARAGRAPH 189.** To the extent the allegations contained in Paragraph 189 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 189 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 190.** To the extent the allegations contained in Paragraph 190 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 190 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in

Paragraph 190 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 191.** To the extent the allegations contained in Paragraph 191 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 191 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 191 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 192.** Agri Stats denies the allegations contained in Paragraph 192 of the Complaint.

**ANSWER TO PARAGRAPH 193.** To the extent the allegations contained in Paragraph 193 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 193 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 193 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 194.** To the extent the allegations contained in Paragraph 194 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 194 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 195.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 195 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 196.** To the extent the allegations contained in Paragraph 196 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 196 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 197.** To the extent the allegations contained in Paragraph 197 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 197 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 198.** To the extent the allegations contained in Paragraph 198 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 198 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 199.** To the extent the allegations contained in Paragraph 199 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 199 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 200.** To the extent the allegations contained in Paragraph 200 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 200 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 201.** To the extent the allegations contained in Paragraph 201 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 201 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 202.** To the extent the allegations contained in Paragraph 202 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 202 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 203.** To the extent the allegations contained in Paragraph 203 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 203 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 204.** To the extent the allegations contained in Paragraph 204 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 204 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 205.** To the extent the allegations contained in Paragraph 205 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 205 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 205 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 206.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 206 of the Complaint. To the extent the remaining allegations contained in Paragraph 206 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 206 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 207.** To the extent the allegations contained in Paragraph 207 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 207 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 208.** To the extent the allegations contained in Paragraph 208 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 208 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 209.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 209 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 209 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 210.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 210 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 211.** Agri Stats admits that it was a member of the American Meat Association from 2010-2015. Agri Stats also admits that its

employees attended trade association events sponsored by the American Meat Institute. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 211 of the Complaint. To the extent the remaining allegations contained in Paragraph 211 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 211 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context.

**ANSWER TO PARAGRAPH 212.** Agri Stats admits that Steve Meyer was a Vice President of Pork Analysis at Express Markets. Agri Stats admits that Express Markets is a subsidiary of Agri Stats. Agri Stats admits that Steve Meyer gave various presentations at the Annual Meat Conferences. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 212 of the Complaint. To the extent the remaining allegations contained in Paragraph 212 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations in Paragraph 212 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such documents speak for themselves and denies any characterization or description that is inconsistent therewith or taken

out of context.

**ANSWER TO PARAGRAPH 213.** To the extent the allegations contained in Paragraph 213 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 213 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 214.** To the extent the allegations contained in Paragraph 214 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 214 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 215.** To the extent the allegations contained in Paragraph 215 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 215 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 216.** To the extent the allegations contained in Paragraph 216 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 216 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 217.** To the extent the allegations contained in Paragraph 217 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 217 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 218.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 218 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 219.** Agri Stats denies the allegations contained in Paragraph 219 of the Complaint

**ANSWER TO PARAGRAPH 220.** To the extent the allegations contained in Paragraph 220 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 220 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 220 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 221.** Agri Stats denies the allegations contained in Paragraph 221 of the Complaint.

**ANSWER TO PARAGRAPH 222.** To the extent the allegations contained in Paragraph 222 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 222 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 222 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 223.** To the extent the allegations contained in Paragraph 223 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 223 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in

Paragraph 223 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 224.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 224 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 224 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 225.** To the extent the allegations contained in Paragraph 225 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 225 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 225 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 226.** To the extent the allegations contained in Paragraph 226 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 226 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 227.** To the extent the allegations contained in

Paragraph 227 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 227 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 228.** To the extent the allegations contained in Paragraph 228 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 228 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 228 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 229.** To the extent the allegations contained in Paragraph 229 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the remaining allegations contained in Paragraph 229 of the Complaint.

**ANSWER TO PARAGRAPH 230.** Agri Stats denies the allegations contained in

Paragraph 230 of the Complaint.

**ANSWER TO PARAGRAPH 231.** To the extent the allegations contained in Paragraph 231 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 231 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 231 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 232.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 232 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 233.** To the extent the allegations contained in Paragraph 233 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 233 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 234.** To the extent the allegations contained in Paragraph 234 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 234 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 235.** To the extent the allegations contained in Paragraph 235 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 235 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 236.** To the extent the allegations contained in Paragraph 236 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 236 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 237.** To the extent the allegations contained in Paragraph 237 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 237 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 238.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 238 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 239.** To the extent the allegations contained in Paragraph 239 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 239 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 240.** To the extent the allegations contained in Paragraph 240 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 240 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 241.** To the extent the allegations contained in Paragraph 241 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 241 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 242.** To the extent the allegations contained in Paragraph 242 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 242 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 243.** To the extent the allegations contained in Paragraph 243 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 243 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 244.** . To the extent the allegations contained in Paragraph 244 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 244 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 244 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 245.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 245 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 246.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 246 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 247.** To the extent the allegations contained in Paragraph 247 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 247 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 248.** To the extent the allegations contained in Paragraph 248 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 248 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 249.** To the extent the allegations contained in Paragraph 249 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 249 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 250.** To the extent the allegations contained in Paragraph 250 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 250 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 251.** To the extent the allegations contained in Paragraph 251 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief

concerning the truth of the allegations contained in Paragraph 251 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 252.** To the extent the allegations contained in Paragraph 252 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 252 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 253.** To the extent the allegations contained in Paragraph 253 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 253 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 254.** To the extent the allegations contained in Paragraph 254 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 254 of the

Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 255.** To the extent the allegations contained in Paragraph 255 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 255 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 256.** To the extent the allegations contained in Paragraph 256 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 256 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 257.** To the extent the allegations contained in Paragraph 257 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 257 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 258.** To the extent the allegations contained in Paragraph 258 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 258 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 259.** To the extent the allegations contained in Paragraph 259 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 259 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 260.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 260 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 261.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 261 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 262.** To the extent the allegations contained in Paragraph 262 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 262 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 263.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 263 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 264.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 264 of the Complaint. To the extent the remaining allegations contained in Paragraph 264 relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 264 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 265.** Agri Stats denies the existence of a conspiracy, as alleged in Paragraph 265 of the Complaint. To the extent the remaining allegations contained in Paragraph 265 relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 265 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 266.** To the extent the allegations contained in Paragraph 266 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 266 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 267.** To the extent the allegations contained in Paragraph 267 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 267 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 268.** To the extent the allegations contained in Paragraph 268 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 268 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations

contained in Paragraph 268 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 269.** To the extent the allegations contained in Paragraph 269 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 269 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 270.** To the extent the allegations contained in Paragraph 270 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 270 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 271.** To the extent the allegations contained in Paragraph 271 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 271 of the

Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 272.** To the extent the allegations contained in Paragraph 272 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 272 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 273.** To the extent the allegations contained in Paragraph 273 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 273 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 274.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 274 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 275.** To the extent the allegations contained in Paragraph 275 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 275 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 276.** To the extent the allegations contained in Paragraph 276 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 276 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 277.** To the extent the allegations contained in Paragraph 277 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 277 of the Complaint. To the extent the remaining allegations contained in Paragraph 277 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 277 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 278.** To the extent the allegations contained in

Paragraph 278 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 278 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 279.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 279 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 280.** To the extent the allegations contained in Paragraph 280 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 280 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 281.** To the extent the allegations contained in Paragraph 281 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 281 of the

Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 282.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 282 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 283.** To the extent the allegations contained in Paragraph 283 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 283 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 284.** To the extent the allegations contained in Paragraph 284 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 284 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 285.** To the extent the allegations contained in Paragraph 285 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 285 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 286.** To the extent the allegations contained in Paragraph 286 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 286 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 287.** To the extent the allegations contained in Paragraph 287 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 287 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 288.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 288 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 289.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in

Paragraph 289 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 290.** To the extent the allegations contained in Paragraph 290 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 290 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 291.** To the extent the allegations contained in Paragraph 291 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 291 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 292.** To the extent the allegations contained in Paragraph 292 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 292 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 293.** To the extent the allegations contained in Paragraph 293 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 293 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 294.** To the extent the allegations contained in Paragraph 294 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 294 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 295.** To the extent the allegations contained in Paragraph 295 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 295 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 296.** To the extent the allegations contained in

Paragraph 296 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 296 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 296 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 297.** To the extent the allegations contained in Paragraph 297 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 297 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 298.** To the extent the allegations contained in Paragraph 298 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 298 of the Complaint. Agri Stats lacks knowledge or information sufficient to

form a belief concerning the truth of the remaining allegations contained in Paragraph 298 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 299.** To the extent the allegations contained in Paragraph 299 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 299 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 300.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 300 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 301.** To the extent the allegations contained in Paragraph 301 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 301 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 302.** To the extent the allegations contained in Paragraph 302 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 302 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 303.** To the extent the allegations contained in Paragraph 303 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 303 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 303 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 304.** To the extent the allegations contained in Paragraph 304 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 304 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 305.** To the extent the allegations contained in Paragraph 305 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 305 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 306.** To the extent the allegations contained in Paragraph 306 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 306 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 307.** To the extent the allegations contained in Paragraph 307 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 307 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 308.** To the extent the allegations contained in Paragraph 308 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 308 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 309.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 309 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 309 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 310.** To the extent the allegations contained in Paragraph 310 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 310 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 311.** To the extent the allegations contained in Paragraph 311 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the existence of a conspiracy as alleged in Paragraph 311 of the Complaint. To the extent the remaining allegations contained in Paragraph 311 of the Complaint relate to other Defendants and/or third parties to

this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the remaining allegations contained in Paragraph 311 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 312.** To the extent the allegations contained in Paragraph 312 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 312 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 313.** To the extent the allegations contained in Paragraph 313 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 313 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 314.** Agri Stats denies the allegations contained in Paragraph 314 of the Complaint.

**ANSWER TO PARAGRAPH 315.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 315 of the Complaint. To the extent the allegations

contained in Paragraph 315 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 315 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 316.** To the extent the allegations contained in Paragraph 316 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 316 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 317.** Agri Stats denies the allegations contained in Paragraph 317 of the Complaint

**ANSWER TO PARAGRAPH 318.** To the extent the allegations contained in Paragraph 318 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 318 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 319.** To the extent the allegations contained in Paragraph 319 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 319 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 320.** To the extent the allegations contained in Paragraph 320 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 320 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 321.** To the extent the allegations contained in Paragraph 321 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 321 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations

contained in Paragraph 321 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 322.** To the extent the allegations contained in Paragraph 322 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 322 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 323.** To the extent the allegations contained in Paragraph 323 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 323 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 324.** To the extent the allegations contained in Paragraph 324 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 324 of the

Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 325.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 325 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 325 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 326.** To the extent the allegations contained in Paragraph 326 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 326 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 327.** To the extent the allegations contained in Paragraph 327 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 327 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 328.** To the extent the allegations contained in Paragraph 328 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 328 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 329.** To the extent the allegations contained in Paragraph 329 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 329 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 330.** To the extent the allegations contained in Paragraph 330 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 330 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 331.** To the extent the allegations contained in Paragraph 331 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 331 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 332.** To the extent the allegations contained in Paragraph 332 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 332 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 333.** To the extent the allegations contained in Paragraph 333 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 333 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 334.** To the extent the allegations contained in Paragraph 334 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 334 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 335.** To the extent the allegations contained in Paragraph 335 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 335 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 336.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 336 of the Complaint. To the extent the allegations contained in Paragraph 336 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 336 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 337.** To the extent the allegations contained in Paragraph 337 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of

context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 337 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 338.** To the extent the allegations contained in Paragraph 338 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 338 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 339.** To the extent the allegations contained in Paragraph 339 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 339 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 340.** To the extent the allegations contained in Paragraph 340 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief

concerning the truth of the allegations contained in Paragraph 340 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 341.** To the extent the allegations contained in Paragraph 341 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 341 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 342.** To the extent the allegations contained in Paragraph 342 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 342 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 343.** To the extent the allegations contained in Paragraph 343 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 343 of the

Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 344.** To the extent the allegations contained in Paragraph 344 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 344 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 345.** To the extent the allegations contained in Paragraph 345 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 345 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 346.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 346 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 347.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 347 of the Complaint. To the extent the allegations contained in Paragraph 347 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for

themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 347 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 348.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 348 of the Complaint. To the extent the allegations contained in Paragraph 348 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 348 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 349.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 349 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 349 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 350.** To the extent the allegations contained in Paragraph 350 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief

concerning the truth of the allegations contained in Paragraph 350 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 351.** To the extent the allegations contained in Paragraph 351 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 351 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 352.** To the extent the allegations contained in Paragraph 352 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 352 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 353.** To the extent the allegations contained in Paragraph 353 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 353 of the

Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 354.** To the extent the allegations contained in Paragraph 354 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 354 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 355.** To the extent the allegations contained in Paragraph 355 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 355 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 356.** To the extent the allegations contained in Paragraph 356 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 356 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 357.** To the extent the allegations contained in Paragraph 357 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 357 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 358.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 358 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 359.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 359 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 360.** To the extent the allegations contained in Paragraph 360 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 360 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 361.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in

Paragraph 361 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 362.** To the extent the allegations contained in Paragraph 362 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 362 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 363.** To the extent the allegations contained in Paragraph 363 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 363 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 364.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 364 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 364 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 365.** To the extent the allegations contained in Paragraph 365 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 365 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 366.** To the extent the allegations contained in Paragraph 366 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 366 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 367.** To the extent the allegations contained in Paragraph 367 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 367 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 368.** To the extent the allegations contained in Paragraph 368 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 368 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 369.** Agri Stats denies the allegations contained in Paragraph 369 of the Complaint.

**ANSWER TO PARAGRAPH 370.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 370 of the Complaint. To the extent the allegations contained in Paragraph 370 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 370 of the Complaint.

**ANSWER TO PARAGRAPH 371.** To the extent the allegations contained in Paragraph 371 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 371 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 372.** . Agri Stats denies the existence of a conspiracy as alleged in Paragraph 372 of the Complaint. To the extent the allegations

contained in Paragraph 372 of the Complaint purports to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 372 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 373.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 373 of the Complaint. To the extent the allegations contained in Paragraph 373 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 373 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 374.** To the extent the allegations contained in Paragraph 374 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 374 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations

contained in Paragraph 374 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 375.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 375 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 375 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 376.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 376 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 376 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 377.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 377 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 377 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 378.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 378 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 378 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 379.** Agri Stats denies the allegations contained in Paragraph 379 of the Complaint.

**ANSWER TO PARAGRAPH 380.** To the extent the allegations contained in Paragraph 380 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 380 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 381.** To the extent the allegations contained in Paragraph 381 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 381 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 381 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 382.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 382 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining

allegations contained in Paragraph 382 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 383.** To the extent the allegations contained in Paragraph 383 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 383 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 384.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 384 of the Complaint. To the extent the allegations contained in Paragraph 384 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 384 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 385.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 385 of the Complaint. To the extent the allegations contained in Paragraph 385 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent

therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 385 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 386.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 386 of the Complaint. To the extent the allegations contained in Paragraph 386 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 386 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 387.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 387 of the Complaint. To the extent the allegations contained in Paragraph 387 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 387 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 388.** Paragraph 388 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 388 of the

Complaint.

**ANSWER TO PARAGRAPH 389.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 389 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 389 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 390.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 390 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 390 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 391.** Agri Stats denies the allegations contained in Paragraph 391 of the Complaint.

**ANSWER TO PARAGRAPH 392.** Agri Stats denies the allegations contained in Paragraph 392 of the Complaint.

**ANSWER TO PARAGRAPH 393.** To the extent the allegations contained in Paragraph 393 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 393 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 394.** To the extent the allegations contained in Paragraph 394 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 394 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 395.** To the extent the allegations contained in Paragraph 395 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 395 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 396.** To the extent the allegations contained in Paragraph 396 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 396 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 397.** To the extent the allegations contained in

Paragraph 397 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 397 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 397 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 398.** To the extent the allegations contained in Paragraph 398 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 398 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 399.** To the extent the allegations contained in Paragraph 399 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 399 of the

Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 400.** To the extent the allegations contained in Paragraph 400 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 400 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 401.** To the extent the allegations contained in Paragraph 401 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 401 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 402.** To the extent the allegations contained in Paragraph 402 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 402 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 403.** To the extent the allegations contained in

Paragraph 403 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 403 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 404.** To the extent the allegations contained in Paragraph 404 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 404 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 405.** To the extent the allegations contained in Paragraph 405 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 405 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 406.** To the extent the allegations contained in Paragraph 406 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 406 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 407.** To the extent the allegations contained in Paragraph 407 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 407 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 408.** To the extent the allegations contained in Paragraph 408 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 408 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 409.** To the extent the allegations contained in Paragraph 409 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 409 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 410.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 410 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 411.** To the extent the allegations contained in Paragraph 411 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 411 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 412.** To the extent the allegations contained in Paragraph 412 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 412 of the Complaint, and therefore denies the same

**ANSWER TO PARAGRAPH 413.** To the extent the allegations contained in

Paragraph 413 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 413 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 414.** To the extent the allegations contained in Paragraph 414 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 414 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 415.** To the extent the allegations contained in Paragraph 415 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 415 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 416.** To the extent the allegations contained in Paragraph 416 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 416 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 417.** To the extent the allegations contained in Paragraph 417 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 417 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 418.** To the extent the allegations contained in Paragraph 418 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 418 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 418 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 419.** To the extent the allegations contained in

Paragraph 419 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 419 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 420.** Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 420 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 421.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 421 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 421 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 422.** To the extent the allegations contained in Paragraph 422 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 422 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 423.** To the extent the allegations contained in

Paragraph 423 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 423 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 424.** To the extent the allegations contained in Paragraph 424 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 424 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 425.** To the extent the allegations contained in Paragraph 425 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations contained in Paragraph 425 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 426.** To the extent the allegations contained in Paragraph 426 of the Complaint purport to characterize or describe documents or

other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 426 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 426 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same

**ANSWER TO PARAGRAPH 427.** Agri Stats admits that it was named as a defendant in the *In re Broilers* litigation. Agri Stats denies the remaining allegations contained in Paragraph 427 of the Complaint.

**ANSWER TO PARAGRAPH 428.** To the extent the allegations contained in Paragraph 428 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 428 of the Complaint.

**ANSWER TO PARAGRAPH 429.** To the extent the allegations contained in Paragraph 429 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 429 of the

Complaint.

**ANSWER TO PARAGRAPH 430.** To the extent the allegations contained in Paragraph 430 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 430 of the Complaint.

**ANSWER TO PARAGRAPH 431.** To the extent the allegations contained in Paragraph 431 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 431 of the Complaint.

**ANSWER TO PARAGRAPH 432.** To the extent the allegations contained in Paragraph 432 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 432 of the Complaint.

**ANSWER TO PARAGRAPH 433.** To the extent the allegations contained in Paragraph 433 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies

any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 433 of the Complaint.

**ANSWER TO PARAGRAPH 434.** To the extent the allegations contained in Paragraph 434 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 434 of the Complaint.

**ANSWER TO PARAGRAPH 435.** To the extent the allegations contained in Paragraph 435 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. Agri Stats denies the allegations contained in Paragraph 435 of the Complaint.

**ANSWER TO PARAGRAPH 436.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 436 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 436 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 437.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 437 of the Complaint. Agri Stats lacks knowledge or

information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 437 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 438.** Agri Stats denies the existence of a conspiracy as alleged in Paragraph 438 of the Complaint. Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the remaining allegations contained in Paragraph 438 of the Complaint, and therefore denies the same.

**ANSWER TO PARAGRAPH 439.** To the extent the allegations contained in Paragraph 439 of the Complaint purport to characterize or describe documents or other sources, Agri Stats states that such sources speak for themselves and denies any characterization or description that is inconsistent therewith or taken out of context. To the extent the allegations contained in Paragraph 439 of the Complaint relate to other Defendants and/or third parties to this action, Agri Stats lacks knowledge or information sufficient to form a belief concerning the truth of the allegations, and therefore denies the same. To the extent the allegations contained in Paragraph 439 of the Complaint purport to relate to Agri Stats, Agri Stats denies the same.

**ANSWER TO PARAGRAPH 440.** Agri Stats denies the allegations contained in Paragraph 440 of the Complaint.

**ANSWER TO PARAGRAPH 441.** Agri Stats denies the allegations contained in Paragraph 441 of the Complaint.

**ANSWER TO PARAGRAPH 442.** Agri Stats denies the allegations contained in Paragraph 442 of the Complaint.

**ANSWER TO PARAGRAPH 443.** Agri Stats denies the allegations contained in Paragraph 443 of the Complaint.

**ANSWER TO PARAGRAPH 444.** Agri Stats denies the allegations contained in Paragraph 444 of the Complaint.

**ANSWER TO PARAGRAPH 445.** Agri Stats denies the allegations contained in Paragraph 445 of the Complaint.

**ANSWER TO PARAGRAPH 446.** Agri Stats denies the allegations contained in Paragraph 446 of the Complaint.

**ANSWER TO PARAGRAPH 447.** Agri Stats denies the allegations contained in Paragraph 447 of the Complaint.

**ANSWER TO PARAGRAPH 448.** Agri Stats denies the allegations contained in Paragraph 448 of the Complaint.

**ANSWER TO PARAGRAPH 449.** Agri Stats denies the allegations contained in Paragraph 449 of the Complaint.

**ANSWER TO PARAGRAPH 450.** Paragraph 450 of the Complaint does not contain any factual allegations to which a response is required. To the extent a response is required, Agri Stats incorporates by reference its responses to each preceding Paragraph as if fully set forth herein.

**ANSWER TO PARAGRAPH 451.** Paragraph 451 of the Complaint contains legal assertions as to which no response is required. To the extent a response is

required, Agri Stats denies any allegations contained in Paragraph 451 of the Complaint.

**ANSWER TO PARAGRAPH 452.** Paragraph 452 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 452 of the Complaint.

**ANSWER TO PARAGRAPH 453.** Paragraph 453 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 453 of the Complaint.

**ANSWER TO PARAGRAPH 454.** Agri Stats denies the allegations contained in Paragraph 454 of the Complaint.

**ANSWER TO PARAGRAPH 455.** Agri Stats denies the allegations contained in Paragraph 455 of the Complaint.

**ANSWER TO PARAGRAPH 456.** Agri Stats denies the allegations contained in Paragraph 456 of the Complaint.

**ANSWER TO PARAGRAPH 457.** Agri Stats denies the allegations contained in Paragraph 457 of the Complaint.

**ANSWER TO PARAGRAPH 458.** Agri Stats denies the allegations contained in Paragraph 458 of the Complaint.

**ANSWER TO PARAGRAPH 459.** Agri Stats denies the allegations contained in Paragraph 459 of the Complaint.

**ANSWER TO PARAGRAPH 460.** Paragraph 460 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 460 of the Complaint.

**ANSWER TO PARAGRAPH 461.** Paragraph 461 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations.

**ANSWER TO PARAGRAPH 462.** Paragraph 462 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 462 of the Complaint

**ANSWER TO PARAGRAPH 463.** Paragraph 463 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 463 of the Complaint

**ANSWER TO PARAGRAPH 464.** Paragraph 464 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 464 of the Complaint

**ANSWER TO PARAGRAPH 465.** Agri Stats denies the allegations contained in Paragraph 465 of the Complaint.

**ANSWER TO PARAGRAPH 466.** Agri Stats denies the allegations contained in

Paragraph 466 of the Complaint.

**ANSWER TO PARAGRAPH 467.** Agri Stats denies the allegations contained in Paragraph 467 of the Complaint.

**ANSWER TO PARAGRAPH 468.** Agri Stats denies the allegations contained in Paragraph 468 of the Complaint.

**ANSWER TO PARAGRAPH 469.** Agri Stats denies the allegations contained in Paragraph 469 of the Complaint.

**ANSWER TO PARAGRAPH 470.** Paragraph 470 of the Complaint contains legal assertions as to which no response is required. To the extent a response is required, Agri Stats denies any allegations contained in Paragraph 470 of the Complaint.

**ANSWER TO PARAGRAPH 471.** Agri Stats denies the allegations contained in Paragraph 471 of the Complaint.

**ANSWER TO PRAYER FOR RELIEF:** This Paragraph of the Complaint does not contain any factual allegations to which a response is required. To the extent a response is required, Agri Stats incorporates by reference its responses to each preceding Paragraph as if fully set forth herein.

**ANSWER TO JURY DEMAND:** This Paragraph of the Complaint does not contain any factual allegations to which a response is required. To the extent a response is required, Agri Stats incorporates by reference its responses to each preceding Paragraph as if fully set forth herein.

**AFFIRMATIVE DEFENSES**

## **FIRST DEFENSE**

1. Plaintiffs' claims are barred, in whole or in part, by the applicable statute of limitations.

2. The statute of limitations for Plaintiffs' federal claims is four years. 15 U.S.C. § 15(b). To the extent Plaintiffs seek damages or other relief for any putative injuries occurring outside the four-year period, Plaintiffs' claims are barred unless they establish that they could not have discovered such claims within the limitations period exercising reasonable diligence.

3. Plaintiffs cannot satisfy this burden: the challenged conduct occurred between seven and ten years ago.

4. Moreover, the facts Plaintiffs cite in support of their claims were made public more than four years ago.

5. Plaintiffs' reliance on the doctrine of fraudulent concealment recycles the Complaint's underlying allegations and asserts fraudulent concealment in a conclusory fashion. Plaintiffs cannot establish any concealment of their claims, much less fraudulent concealment of their claims.

6. Accordingly, Plaintiffs' Complaint is time-barred.

## **SECOND DEFENSE**

7. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have suffered neither any injury in fact nor any injury cognizable under the antitrust laws.

8. Plaintiffs' alleged harm lies in their speculation that a conspiracy among many companies operated seamlessly over almost a decade resulting in their harm. In

essence, Plaintiffs complain about the impact of naturally unpredictable changes in the market conditions that exist in a global economy.

9. To the extent that Plaintiffs maintain that they were injured by these events, such an injury is not cognizable under the antitrust laws.

### **THIRD DEFENSE**

10. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to exercise reasonable care to mitigate any damages they may have suffered.

11. The facts Plaintiffs cite in support of their claims were made public years ago. Agri Stats incorporates Paragraph 4 above in support of this defense.

12. To the extent Plaintiffs believed that Defendants agreed to cut pork production and that such agreement had the effect of raising prices above competitive levels, Plaintiffs had an obligation to mitigate their damages by seeking other sources of supply, including from other producers.

13. Plaintiffs' failure to exercise reasonable care to mitigate damages was the complete or partial cause of any damages Plaintiffs may have suffered.

### **FOURTH DEFENSE**

14. Plaintiffs' claims are barred, in whole or in part, by the doctrine of waiver.

15. The facts Plaintiffs cites in support of their claims were made public more than four years ago. Agri Stats incorporates Paragraph 4 above in support of this defense.

16. Plaintiffs' continued purchases of pork at what they now allege were prices above the competitive level manifest an intention to waive any right to bring this suit and are inconsistent with any other intention.

17. Plaintiffs, by their actions, accepted the benefits of an ongoing relationship with defendant producers and relinquished their rights to bring suit.

#### **FIFTH DEFENSE**

18. Plaintiffs' claims are barred by the equitable doctrine of laches.

19. Agri Stats hereby incorporates Paragraph 4 above in support of this defense. Plaintiffs demonstrated an unreasonable lack of diligence in bringing its claims. As set forth in support of Agri Stats statute of limitations defense, the challenged conduct that underlies Plaintiffs' claims occurred between seven and ten years ago. Likewise, the specific facts Plaintiffs cite in support of its claims were publicly available long ago. This unreasonable lack of diligence in raising their claims now bars them.

#### **SIXTH DEFENSE**

20. In its June 20, 2022 submission of Affirmative Defenses, Agri Stats asserted that Plaintiffs' claims are barred, in whole or in part, due to the ratification of, and consent to, the conduct of Agri Stats. Agri Stats no longer asserts the affirmative defense of ratification and consent.

#### **SEVENTH DEFENSE**

21. Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs seeks to impose liability on Defendants based on the exercise of any person or entity's right to petition federal, state and local governmental bodies, including through public statements, because such conduct was immune under the *Noerr-Pennington* doctrine and privileged under the First Amendment to the U.S. Constitution.

#### **EIGHTH DEFENSE**

22. Without admitting the existence of any contract, combination or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by Agri Stats's right to set off any amounts paid to Plaintiffs by any Defendants other than Agri Stats who have settled, or do settle, Plaintiffs' claims against them in this action.

#### **NINTH DEFENSE**

23. Without admitting the existence of any contract, combination or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs entered into cost-plus contracts with parties who purchased from Plaintiffs before Plaintiffs began paying any purported overcharge.

#### **TENTH DEFENSE**

24. Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution and of the Eighth Amendment of the United States Constitution.

#### **ELEVENTH DEFENSE**

25. To the extent that Plaintiffs seek to collect compensatory damages, penalties, punitive damages, exemplary damages, attorneys' fees and expenses, and other monetary relief from Agri Stats, they seek a recovery that is so grossly excessive and inequitable that it would violate the Due Process Clauses of the Fifth and Fourteenth Amendments of the United States Constitution.

**TWELFTH DEFENSE**

26. Plaintiffs' claims are barred in whole or in part, to the extent that Plaintiffs seek recovery for damages under federal antitrust law resulting from indirect purchases of pork. Alternatively, to the extent Plaintiffs seek or may seek damages or other monetary relief for indirect purchases, such claims are barred in whole or in part because the seller did not pass on any overcharge or the purchaser passed on such overcharge to a subsequent purchaser.

**THIRTEENTH DEFENSE**

27. Plaintiffs' claims are barred, in whole or in part, by the Plaintiffs' active and knowing acquiescence, equal involvement and participation in the creation and origination of the restraints of trade alleged in the Complaint.

**FOURTEENTH DEFENSE**

28. Upon information and belief, Plaintiffs' claims are barred, in whole or in part, by Agri Stats' right to set off any amount paid to Plaintiffs by damages attributable to Plaintiffs' conduct to the extent Plaintiffs unlawfully coordinated regarding the purchase price of Pork, including by communicating and sharing competitively sensitive information.

**FIFTEENTH DEFENSE (Asserted against Plaintiffs with claims against Agri Stats under the Packers & Stockyards Act)**

29. Plaintiffs' Claims are barred under the Packers & Stockyards Act because the Plaintiffs lack standing.

30. Section 209 of the Packers & Stockyards Act grants a private right of action to any person injured by a violation of the Packers & Stockyards Act relating to the “[i] purchase, sale, or handling of livestock, [ii] the purchase or sale of poultry, or [iii] relating to any poultry growing arrangement or swine production contract.” 7 U.S.C. § 209(a).

31. Plaintiffs do not allege injury caused by the “purchase, sale, or handling of livestock,” which is defined as “cattle, sheep, swine, horses, mules, or goats—whether live or dead.” 7 U.S.C. § 182(4). Nor do Plaintiffs allege that they have entered any “swine production contract” with Agri Stats or any injury arising from any “swine production contract” with any Defendant. Plaintiffs allege injury through the sale of what the Act defines as “meat food products”—all products and byproducts of the slaughtering and meat-packing industry—if edible.” 7 U.S.C. § 182(3). But the Packers & Stockyards Act does not grant a private right of action for injuries resulting from a violation of the Act in connection with the sale of “meat food products.”

32. Thus, Plaintiffs’ claim falls outside the scope of Section 209(a), and Plaintiffs do not have standing to assert a private right of action under the law.

### **SIXTEENTH DEFENSE**

33. Agri Stats reserves the right to assert other defenses as this action proceeds up to and including the time of trial.

### **PRAYER FOR RELIEF**

WHEREFORE, Defendant Agri Stats respectfully requests that judgment be entered in favor of the Agri Stats and the other Defendants and against Plaintiffs,

dismissing the Complaint in its entirety with prejudice. Defendant Agri Stats further request that this Court award the Agri Stats (i) their costs and disbursements, and (ii) such other and further relief as the Court deems proper.

Dated: January 20, 2023

Respectfully submitted,

/s/ William L. Monts III

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*Attorneys for Defendant Agri Stats,  
Inc.*

**CERTIFICATE OF SERVICE**

William L. Monts III, an attorney, hereby certifies that on January 20, 2023 he caused a true and correct copy of the foregoing **Agri Stats, Inc.'s Answer and Defenses to Direct Action Plaintiffs' Consolidated Complaint** to be filed electronically with the Court's CM/ECF system, and that notice of this filing was sent by electronic mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to receive electronic filings as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ William L. Monts III